

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-CR-80107-MIDDLEBROOKS**

**UNITED STATES OF AMERICA**

**vs.**

**VANESSA RODRIGUEZ,**

**Defendant.**

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**FACTUAL BASIS**

The United States of America and the Defendant Vanessa Rodriguez (“Rodriguez”) agree that had this case proceeded to trial, the United States would prove beyond a reasonable doubt the following facts, among others, which occurred in the Southern District of Florida, and elsewhere.

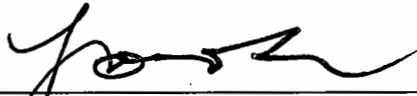
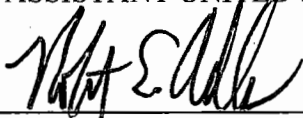
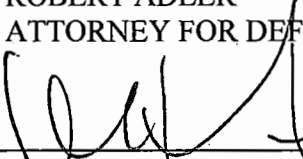
Rodriguez worked at an accounting firm located in Miami, Florida. At the accounting firm, Rodriguez managed accounts for clients. Her clients included a recording artist and his wife (Victim 1) and a baseball player (Victim 2). Rodriguez’ clients relied on her to handle their personal finances, such as paying their credit cards and mortgages. The accounting firm was acquired in 2021, and Rodriguez continued to manage her clients’ accounts. In July 2022, Rodriguez started her own company and continued to manage her clients’ accounts.

An American Express–Delta Sky Miles credit card was issued in Victim 1’s name. Without the authorization of Victim 1, Rodriguez used this credit card for cash advances, groceries, food delivery, clothing, and cosmetic surgery. In addition, a Capital One–Saks Fifth Avenue credit card and a Capital One–Bergdorf Goodman credit card were issued in Victim 1’s name. Without authorization from Victim 1, Rodriguez used these credit cards to make personal purchases.

A Capital One-Saks Fifth Avenue credit card was issued in Victim 2's name. Without authorization from Victim 2, Rodriguez used this credit card to fund her bank account through PayPal—a peer to peer money transfer service—and to purchase goods and services for herself, such as cosmetic procedures.

From January 1, 2020, through December 31, 2020, Rodriguez effected transactions with credit cards issued to Victim 1 and Victim 2. These credit cards were issued by national banks, which operate in interstate commerce, and used at companies that operate inside and outside the State of Florida. As a result of the transactions that occurred from January 1, 2020, through December 31, 2020, Rodriguez received payment or things of value greater than \$1,000.

The information contained in this proffer is not a complete recitation of all the facts and circumstances of this case, but the parties admit that it is sufficient to prove beyond a reasonable doubt a violation of Title 18, United States Code, Section 1029(a)(5), that is, access device fraud, as charged in Count 1 the Indictment.

	MARKENZY LAPOINTE UNITED STATES ATTORNEY
Date: <u>11/13/24</u>	By: <u></u> JONATHAN BAILYN ASSISTANT UNITED STATES ATTORNEY
Date: <u>11/13/24</u>	By: <u></u> ROBERT ADLER ATTORNEY FOR DEFENDANT
Date: <u>11/13/24</u>	By: <u></u> VANESSA RODRIGUEZ DEFENDANT